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7 Attorneys for Gates Estates, Inc.

8 **UNITED STATES DISTRICT COURT OF CALIFORNIA**
9 **NORTHERN DISTRICT**
10 **(SAN FRANCISCO)**

11
12
13
14 Andres Gomez

15 Plaintiff,

16 vs.

17 Gates Estates, Inc.

18 Defendants.

CASE NO.: 3:21-cv-07147-SK

The Honorable William Alsup

**DECLARATION OF COUNSEL IN
SUPPORT OF MOTION TO
DISMISS**

Hearing Date: 2/10/22

Time: 8:00 AM

**DECLARATION OF COUNSEL IN SUPPORT OF MOTION
TO DISMISS**

I, Ara Sahelian, Esq., hereby declare and state as follows:

1. I am an attorney licensed to practice law before all the Courts of the State of California. I personally know the facts stated herein. If called upon to testify, I could and would competently testify to those facts and related facts that I rely upon to establish personal knowledge of the substantive facts asserted below:

2. I represent Gates Estates, Inc., in the within action.

3. **Conference with opposing counsel:** Counsel have met and conferred over these issues, and are at an impasse.

4. Plaintiff has filed a series of complaints against real estate agents operating in Napa. The complaints are carbon copies of each other. They each allege, in essence, that he was unable to navigate an agent's website and was, as a result, prevented from using his/her services. These are a few of the cases Mr. Gomez has filed recently, aside from the within.

Matter: Gomez v. Gates Estates, Inc., Case Number: 3:21-cv-07147-SK, U.S. District Court California Northern District (San Francisco),
The Honorable William Alsup

Matter: Gomez v. Magliocco Group Inc., Case Number: 3:21-cv-07148-JCS, United States District Court, Northern District of California, The Honorable Vince Chhabria

Matter: Gomez v. Naimo, Case Number: 4:21-cv-07328-SBA, United States District Court for the Northern District of California

(Oakland), The Honorable Saundra Brown Armstrong

Matter: Gomez v. Smith, Case Number: 3:21-cv-07154-JCS, U.S.
District Court, Northern District of California (San Francisco), The
Honorable Richard Seeborg

Matter: Gomez v. Sperow, Case Number: 4:21-cv-07852-YGR,
United States District Court for the Northern District of California
(Oakland), The Honorable Yvonne Gonzalez Rogers

All defendants named above are represented by my office.

5. I deposed Plaintiff, Mr. Gomez, in an unrelated case, *Gomez v. Aslan*, Case Number: 21STCV17753, Superior Court of California, County of Los Angeles, The Honorable Gregory Alarcon.

6. I learned that Plaintiff could not possibly qualify for a loan to purchase property in Napa, as he testified that he had been unemployed for a decade or more. See Ex. A, Plaintiff's deposition testimony, p 26. line 3-12.

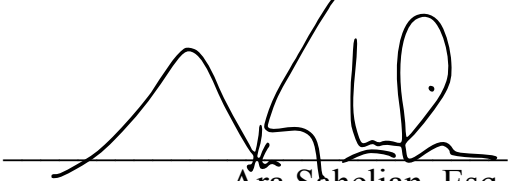
7. Plaintiff also testified that he is domiciled in Florida. See Plaintiff's deposition testimony, p.5, lines 9-12; p.30, lines 1-12; p 53, lines 2-7.

I declare under penalty of perjury under the laws of the State of California, and the United States of America, that the foregoing is true and correct.

Respectfully submitted:

Date: 12/13/2021

SAHELIAN LAW OFFICES



Ara Sahelian, Esq.